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9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA
11 SAN FRANCISCO DIVISION

12 RICHARD KADREY, *et al.*,
13 Individual and Representative Plaintiffs,
14 v.
15 META PLATFORMS, INC., a Delaware
16 corporation;
17 Defendant.

Case No. 3:23-cv-03417-VC-TSH

**DECLARATION OF MICHELLE WOODHOUSE
IN SUPPORT OF ADMINISTRATIVE MOTION
TO FILE UNDER SEAL JOINT DISCOVERY
LETTER BRIEF**

1 I, Michelle Woodhouse, hereby declare:

2 1. I am Associate General Counsel for Defendant, Meta Platforms, Inc. I have personal
3 knowledge of the facts set forth in this declaration and, if called to testify as a witness, could and
4 would testify competently thereto.

5 2. I make this declaration in support of Meta's administrative motion to file under seal
6 unredacted portions of the Parties' Joint Letter Brief regarding Motion to Enforce and for Order
7 Re: Post-October 18 Discovery ("Joint Letter Brief").

8 3. The redacted portion of the Joint Letter Brief discloses sensitive non-public
9 information designated HIGHLY CONFIDENTIAL – ATTORNEYS' EYES ONLY. The
10 information, which appears in a single sentence, reflects Meta's highly sensitive business plans
11 concerning Meta's efforts to obtain training data for its Llama models. Public disclosure of this
12 information exposes Meta to the risk of competitive harm.

13 I declare under penalty of perjury under the laws of the United States of America that the
14 foregoing is true and correct

15 Executed in San Jose, California on this 8th day of November, 2024.

16
17 
18 Michelle Woodhouse